

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

JOANN WRIGHT HAYSBERT,

Plaintiff,

v.

Civil Case No.: 4:20-cv-00121

BLOOMIN' BRANDS, INC., et al,

Defendants.

**MOTION TO RECONSIDER, ALTER OR AMEND THE
COURT'S ORDER IMPOSING SANCTIONS**

COMES NOW, Nazareth M. Haysbert ("Mr. Haysbert"), an interested party, by and through undersigned counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 59(e), to reconsider, alter or amend its July 9, 2024 Order imposing sanctions on Mr. Haysbert (ECF No.: 378) on the grounds of previously unavailable evidence, and the need to correct clear errors of law and prevent manifest injustice, as detailed further in the attached Memorandum in Support. Mr. Haysbert additionally seeks permission from the Court to submit evidence subject to the work product privilege for the Court's in camera review in connection with the instant Motion.

WHEREFORE, Nazareth M. Haysbert, by and through the undersigned counsel, for the reasons set out in the aforementioned Memorandum hereby respectfully requests this Honorable Court to grant his Motion.

Respectfully submitted,

Date: August 6, 2024

By: _____/s/_____
Mary T. Morgan, Esq.
Virginia State Bar No. 44955
Counsel for Interested Party, Nazareth M. Haysbert
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of August 2024, I will electronically file the foregoing with the Clerk of Court using the CM/EMF system, which will send a notification of such filing (NEF) to all counsel of record, including:

John D. McGavin, Esq.
MCGAVIN, BOYCE, BARDOT,
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Counsel for Defendants

I FURTHER CERTIFY that I will send the document by electronic mail and U.S. Mail to the following non-filing user:

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Plaintiff

_____/s/_____
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Virginia State Bar No. 44955
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